

Plaintiff

vs.

HARSHAW CHEMICAL COMPANY

Defendant



468487

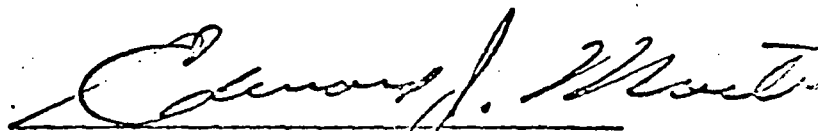
AFFIDAVIT OF DR. EDWARD J. MARTIN

Dr. Edward J. Martin, being first duly sworn, deposes and says:


1. That I am Director of the Clean Water Task Force of the City of Cleveland. In that capacity, I am familiar with the plans entered into by the City of Cleveland and the Harshaw Chemical Company with respect to the introduction of treated calcium sulfate refuse matter into the City of Cleveland sewage system.

2. After consultation with the engineering firms of Dalton, Dalton & Little and Resource Engineering Associates, the City of Cleveland requested bids for the construction of a sewer line from the Harvard Avenue plant of the Harshaw Chemical Company to a City of Cleveland sewage pumping station. Bids were opened on July 31, 1970. It is anticipated that the construction of such sewer line will be completed by December 1, 1970.

3. The introduction of this calcium sulfate into the sewage system will improve the effectiveness of the Southerly Waste Water Treatment Plant by precipitating phosphate pollutants from sewage, thereby facilitating the removal of such pollutants from the effluent of the Treatment Plant.

  
Dr. Edward J. Martin

SWORN to before me this 6<sup>TH</sup> day of AUGUST, 1970.

  
Notary Public

JOHN B. NASH, JR., Notary Public  
For Cuyahoga County, Ohio  
My commission expires Mar. 6, 1973